

## UNITED STATES DISTRICT COURT

for the

Western District of Pennsylvania

United States of America )

v. )

TRAVIS DAVIS ) Case No.

EDMUND HEATH )

CORRELL PEARSON )

BRANDON ROSEBERRY )

11.0654M

*Defendant(s)*

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 6, 2011 in the county of Allegheny in the  
Western District of Pennsylvania, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 371	Conspiracy
18 U.S.C. § 513(a)	Possession of Counterfeit or Forged Security
18 U.S.C. § 1028A(a)(1)	Aggravated Identity Theft

This criminal complaint is based on these facts:

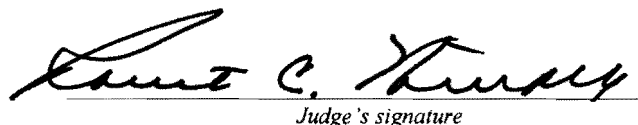
☒ Continued on the attached sheet.

*Complainant's signature*

DAVID J. ANDERCHAK, Postal Inspector, USPS

*Printed name and title*

Sworn to before me and signed in my presence.

Date: 10/07/2011

*Judge's signature*City and state: Pittsburgh, Pennsylvania

ROBERT C. MITCHELL, U.S. Magistrate Judge

*Printed name and title*

11.0654M

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, David J. Anderchak, being duly sworn, depose and state:

1. I am a Postal Inspector with the United States Postal Inspection Service. I have been so employed for eight years. I am responsible for investigating offenses involving passing Counterfeit Securities of Organizations Involved in Interstate Commerce in violation of Title 18, United States Code, Section 513(a), Conspiracy to violate federal laws, in violation of Title 18, United States Code, Section 371 and other violations of federal law connected to financial crimes and identity theft.

2. This affidavit is submitted in support of an application for a Criminal Complaint for Brandon Roseberry; Travis Davis; Edmund Heath, and Corearell Pearson, in connection with violations of Title 18, United States Code, Sections 317, 513(a) and 1028A(a)(1).

3. On October 21, 2011, PNC Bank contacted the Financial Crimes Task Force regarding a large number of counterfeit checks presented at area PNC branches in western Pennsylvania.

4. PNC reported that approximately 18 counterfeit business checks were negotiated between September 26, 2011 and September 29, 2011. As a result of these checks, PNC Bank has sustained a financial loss of \$41,958.

5. The investigation revealed that in all instances, legitimate Pennsylvania driver's licenses were shown during the

negotiations, and that the individuals presenting the checks were transient or homeless individuals.

6. Dating back to 2010, the U.S. Postal Inspection Service has been involved in a coordinated investigation along the East Coast of the United States called "Operation Homeless".

7. "Operation Homeless" has uncovered loosely organized groups that originate out of cities including Charlotte, NC, and Atlanta, GA that travel the East Coast committing check fraud.

8. In their travels, these groups target industrial parks and office buildings stealing business checks from mailboxes. The groups then either counterfeit or "wash" the checks and create or produce counterfeit checks in amounts between \$1,500 and \$3,000.

9. The scheme also involves the organizers or recruiters to recruit homeless individuals or prostitutes, who then present and negotiate the counterfeit checks at the banks in which the account is drawn upon.

10. The organizers also will purchase clothing for the check passers in efforts to make the check passers look more presentable. For their efforts, check passers usually receive 10% of the proceeds.

11. On October 4, 2011, Michael Leonard was arrested by Swissvale Police as he attempted to negotiate a counterfeit check at the PNC Bank located at the Edgewood Town Center in Swissvale, PA. The check made payable to Michael Leonard in the amount of

\$2,800.00 was determined to be counterfeit and was drawn upon the PNC account of Market Place Direct, Inc in McKees Rocks, PA.

12. Postal Inspector David Anderchak interviewed Leonard along with the Swissvale Police. Leonard informed that he was recruited by a friend identified as "O" to negotiate a counterfeit check.

13. According to PNC Bank Investigator Colleen Doheny, two additional counterfeit checks were presented at the PNC Bank Royal Oaks Branch in Monroeville, PA, several hours after the arrest of Michael Leonard.

14. Doheny stated one of the checks was declined and during this transaction, a PNC Bank employee was able to observe a four-door, silver or white sedan bearing Georgia License Plate BUB-3032 that was operated by the suspects.

15. A search of Georgia license plate number BUB-3032 revealed that the vehicle is a silver 2012 Ford Fusion registered to EAN Holdings, in Roswell, GA. The investigation further revealed that EAN Holding was connected to Enterprise Rental Cars.

16. In all cases, PNC Bank has confirmed that the checks were counterfeit and that each of the victim account holders encountered theft of their checks.

17. On October 5, 2011, the City of Pittsburgh Police arrested Vincent Jordan as Jordan attempted to negotiate a counterfeit Laila Darhouse-Ziady check in the amount of \$1820.00.

18. PNC Bank confirmed that the check was counterfeit.

19. Ms. Darhouse-Ziady confirmed to PNC that the check in question was stolen.

20. On October 4<sup>th</sup> and 5<sup>th</sup>, your affiant interviewed Vincent Jordan on October, 5th, 2011 and Michael Leonard, another arrested PNC counterfeit check negotiator.

21. Jordan and Leonard both stated that they were recruited by a black male near the Jubilee Soup Kitchen in Pittsburgh by someone identified as "OJ" to negotiate counterfeit checks. The counterfeit checks were for black males individuals not from Pittsburgh, who spoke with southern accents.

22. Both Leonard and Jordan describe being provided clothing to wear which was purchased for them at either Goodwill or Salvation Army to wear when entering banks to negotiate the checks, and that each would receive a portion of the proceeds. Both Jordan and Leonard describe black males in their 20's, with tatoos on their necks.

23. Jordan stated he met one of the black males who identified himself as "Chris" the night before his arrest and provided "Chris" and two other black males known as "O.J." and "Dre" his Pennsylvania identification card.

24. Jordan stated the "plan" was for "Chris" to produce checks and for Jordan to "cash as many checks as we can". In return Jordan was to be paid "a couple of hundred dollars".

25. Jordan stated he met "Chris" along Forbes Avenue near the Jubilee Soup Kitchen and that Chris drove him, "OJ" and a guy named Dre to the South Side section of Pittsburgh in the white SUV.

26. Jordan stated "Chris" informed him that they "needed to look more presentable" and drove to the Goodwill store in the South Side section of Pittsburgh.

27. Jordan stated "Chris" purchased clothes for the check passers to wear when they entered the banks.

28. Jordan stated "Chris" then drove the men to the PNC Bank located along Forbes Avenue in the Squirrel Hill section of Pittsburgh.

29. Jordan stated "Chris", provided him with his Pennsylvania driver's license, hand wrote the check and provided him the check to negotiate at the PNC Bank.

30. Jordan estimated "Chris" had approximately 10-15 checks in his possession.

31. Jordan stated "Dre" entered the bank first and was unsuccessful at negotiating a counterfeit check.

32. Your affiant believes that "Chris" identified by Jordan closely resembles Travis Davis, based upon Jordan's description of his height and low hair cut.

33. Michael Leonard also describes "Chris" as having close hair.

34. On October 6th, your affiant interviews Richard Mollett following his arrest for negotiating a counterfeit check at the PNC Bank in Squirrel Hill.

35. Mollett describes meeting a black male, 6' wearing dread locks and a green army coat, whom he called a recruiter. The recruiter asked Mollett for two forms of identification, and that he could make some money cashing checks. Your affiant has since determined that this person is Corearell Pearson, from surveillance. Mollett stated he also spoke to a second recruiter, black male, tattoo on his neck, full dread locks, pinned back. This description is also consistent with Edmund Heath.

36. Mollett further states that he was driven by another black male, early 30's, Georgia license plates to the Red Roof Inn in Monroeville, PA, where he remained overnight until the morning of October 6th. Two other negotiators remained at the motel room together. Your affiant believes the vehicle description is consistent with the Ford Fusion referenced above. Mollett states also that they were followed by a large SUV.

37. Mollet also described both recruiters as having a "southern accent."

38. Mollett believes the other black males remained at the Red Roof Inn as well. Mollett stated that the black males paid in cash for the room in \$100.00 notes and for one night stay.

39. On the afternoon of October 6th, your FCTF agents contacts Red Roof Inn in Monroeville. Red Roof Inn provides identification for two of the black males who registered rooms over the preceding week using Georgia identifications: Travis Davis and Brandon Roseberry.

40. The FCTF conducts surveillance on the afternoon and evening of October 6th in Monroeville. Your affiant learned that the recruiters for this scheme will either stay in the same motel with the negotiators, or an adjacent motel.

41. On afternoon of October 6th, your affiant identified a gold, Cadillac Escalade, bearing Georgia license plates DL90E45, parked in front of the Days Inn near the Red Roof Inn in Monroeville.

42. Your affiant observed Brandon Roseberry exit the Days Inn, and drive from the area in the SUV with two black male passengers. Your affiant subsequently confirmed the identities the other two passengers as Travis Davis and Corearell Pearson.

43. The vehicle is followed by FCTF agents to a nearby Outback Steakhouse at approximately 8:00 pm. on October 6th.

44. Roseberry, Pearson and Davis exit the Outback Steakhouse and walk approximately 4 miles from the restaurant to Monroeville Mall during the night where Davis and Pearson are picked up in front of the K-Mart store at Monroeville Mall, by the



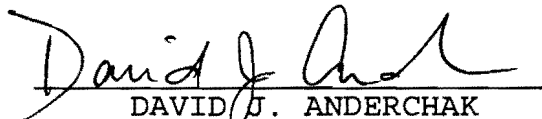
silver Ford Fusion, bearing Georgia license plate BUB3032 matching the description by PNC employees.

45. The vehicle drives through the parking lot at McDonalds onto Route 22, traveling west; the vehicle exits again at an exit for Monroeville Mall, and the vehicle operates erratically until your affiant and FTCTF agents stop the vehicle at the Monroeville Mall parking lot next to Barnes and Nobles store.

46. Brandon Roseberry is seen entering Monroeville Mall and was immediately apprehended.

47. Inside the vehicle were Travis Davis, Edmund Heath and Corearell Pearson. Recovered from the vehicle was the green camoflauge army jacket, and \$100.00 notes were recovered from the individuals.

48. Based upon the above, your affiant has probable cause to believe that the individuals Travis Davis, Brandon Roseberry, Edmund Heath and Corearell Pearson conspired to produce and utter counterfeited securities, and to commit identity theft, in violation of Title 18, U.S.C. Sections 371, 513, and 1028A(a)(1).



DAVID J. ANDERCHAK  
Postal Inspector

U.S. Postal Inspection Service

Sworn and subscribed to before  
me this 7<sup>th</sup> day of October, 2011.

  
UNITED STATES MAGISTRATE JUDGE

